



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

June 9, 2003

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

TO: Interested Parties / Applicant

RE: Superior Solvents and Chemicals, Inc. F 039-16483-00487

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



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## **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY**

**Superior Solvents and Chemicals, Inc.  
1030 All Pro Drive  
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-16483-00487	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 9, 2003  Expiration Date: June 9, 2008

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a chemical solvents distribution terminal.

Authorized individual:	Vice President, Operations
Source Address:	1030 All Pro Drive, Elkhart, Indiana 46514
Mailing Address:	400 West Regent Street, Indianapolis, Indiana 46225
General Source Phone:	317/781-4400
SIC Code:	5169
Source Location Status:	Elkhart
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) a truck loading and unloading operation capable of transferring 100 gallons per minute of solvents;
- (b) six (6) vertical fixed roof solvent storage tanks designated T1 through T6, all installed in 1988, with maximum capacities of 10,000 gallons, each;
- (c) one vertical fixed roof solvent blend tank designated B-1, installed in 1988, with a maximum capacity of 1,000 gallons;
- (d) a 55-gallon drum filling operation capable of filling drums at a rate of 60 gallons per minute with solvents from the tanks specified in (b) and (c) above, or with solvents or resins directly from truck transport;
- (e) a tote tank filling operation capable of filling totes at a rate of 60 gallons per minute with resins directly from truck transport; and
- (f) a tote tank cleaning operation using caustic cleaning agents.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) space heaters totaling 2.6 million (MM) Btu/hr.

- (b) one (1) electric tank truck fan blower with a maximum air flow rate of 1,068 cubic feet per minute. This fan will be used to blow residual vapor out of tank trucks during solvent dispensing into storage tanks.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;



- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
  - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.



- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

## **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

### **C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

### **C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) a truck loading and unloading operation capable of transferring 100 gallons per minute of solvents;
- (b) six (6) vertical fixed roof solvent storage tanks designated T1 through T6, all installed in 1988, with maximum capacities of 10,000 gallons, each;
- (c) one vertical fixed roof solvent blend tank designated B-1, installed in 1988, with a maximum capacity of 1,000 gallons;
- (d) a 55-gallon drum filling operation capable of filling drums at a rate of 60 gallons per minute with solvents from the tanks specified in (b) and (c) above, or with solvents or resins directly from truck transport;
- (e) a tote tank filling operation capable of filling totes at a rate of 60 gallons per minute with resins directly from truck transport; and
- (f) a tote tank cleaning operation using caustic cleaning agents.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total tank throughput of solvents loaded to the liquid storage tanks (T1 through T6 and B-1) shall not exceed 31,632,219.6 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore the VOC emissions from the storage tanks and storage tank to drum filling operation will be limited to less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

#### D.1.2 HAP Limit [326 IAC 2-8-4]

- (a) The total tank throughput of solvents loaded to the liquid storage tanks (T1 through T6 and B-1) shall not exceed 31,632,219.6 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total tank throughput of each individual HAP loaded to the liquid storage tanks (T1 through T6 and B-1) shall not exceed 9,080,732.3 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) For purposes of determining compliance, every gallon of single HAP and combined HAPs containing solvent loaded directly from a truck transport to a container shall be equivalent to 0.686 and 0.895 gallon of single HAP and combined HAPs, respectively, containing solvent loaded to the storage tanks.

These usage limits are required to limit the source's potential to emit of any single HAP and any combination of HAPs to less than 10 and 25 tons, respectively, per 12 consecutive month period. Compliance with these limits make 326 IAC 2-7 not applicable.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

## **Compliance Determination Requirements**

### **D.1.4 Volatile Organic Compounds (VOC)**

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Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.5 Record Keeping Requirements**

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(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.

(1) The amount and HAP content of each chemical/solvent:

(A) loaded to the liquid storage tanks from truck transport; and

(B) loaded into containers from truck transport.

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.6 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Superior Solvents and Chemicals  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225  
FESOP No.: F039-16483-00487

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Superior Solvents and Chemicals  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225  
FESOP No.: F039-16483-00487

**This form consists of 2 pages**

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9 This is an emergency as defined in 326 IAC 2-7-1(12)  
    CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
    CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225  
FESOP No.: F039-16483-00487  
Facility: liquid storage tank loading  
Parameter: VOC/Combined HAPs  
Limit: 31,632,219.6 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Solvent loaded to storage tanks this month (gallons)	Solvent loaded to storage tanks previous 11 months (gallons)	Total solvent loaded to storage tanks last 12 months (gallons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Superior Solvents and Chemicals  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225  
FESOP No.: F039-16483-00487  
Facility: liquid storage tank loading and truck to container filling  
Parameter: each single HAP  
Limit: 9,080,732.3 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Single HAP solvent loaded to storage tanks (& equivalents) usage this month (gallons)	Single HAP solvent loaded to storage tanks (& equivalents usage) previous 11 months (gallons)	Total single HAP solvent loaded to storage tanks (& equivalents usage) last 12 months (gallons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Superior Solvents and Chemicals  
Source Address: 1030 All Pro Drive, Elkhart, Indiana 46514  
Mailing Address: 400 West Regent Street, Indianapolis, Indiana 46225  
FESOP No.: F039-16483-00487

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal**

<b>Source Name:</b>	Superior Solvents and Chemicals, Inc.
<b>Source Location:</b>	1030 All Pro Drive, Elkhart, Indiana 46514
<b>SIC Code:</b>	5169
<b>County:</b>	Elkhart
<b>Operation Permit No.:</b>	F039-16483-00487
<b>Permit Reviewer:</b>	Alic Bent /EVP

On March 3, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Indiana, stating that Superior Solvents and Chemicals, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a stationary chemical solvents distribution terminal. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On March 21, 2003, Susan Harris, Superior Solvents and Chemicals submitted a comment on the proposed FESOP Renewal. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

#### **Comment**

The electric tank truck fan blower listed as item (b) in Section A.3 is most likely not an insignificant activity. We have recently been keeping records at another facility which indicate that the levels of VOC emitted may exceed the insignificant level (3 pounds per hour or 15 pounds per day) as listed in 326 IAC 2-7-1(21)(iv). The initial information submitted to IDEM indicated emissions of 4.22 pounds per hour based on testing with acetone, with a maximum potential of HAP emission of 3.85 tons per year.

Superior will keep records of the hours of operation for the tank truck blower as well as the material within the truck in order to calculate emissions reportable in Annual Emissions Statement required by 326 IAC 2-6-1.

#### **Response**

The initial information that was submitted to IDEM for the tank truck blower indicating emissions of 4.22 pounds per hour based on testing with acetone was taken from records kept at another Superior plant and does not represent the emissions from the Elkhart plant. Based on new emission calculations submitted by the source on April 30, 2003, the emissions from the tank truck blower are well below the significant level based on the worst case scenario. Therefore, the tank truck blower will remain under Section A.3 (Insignificant Activities) of the permit. There will be no changes to the permit as a result of this comment.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. The following updates have been made to the table of contents in order to be complete, clear, and correct.
- B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]  
~~[326 IAC 2-8-5(a)(4)]~~
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] **[IC 13-30-3-1]**
- B.22 Transfer of Ownership or Operational **Control** [326 IAC 2-8-10]
- C.12 Risk Management Plan [326 IAC 2-8-4] ~~[40 CFR 68.245]~~

## Section B

2. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from B.8 Duty to Supplement and Provide Information.

- B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]  
~~[326 IAC 2-8-5(a)(4)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b)(a)~~ The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- ~~(e)(b)~~ For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
3. B.13 (b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to D Section. Because the general record keeping requirements (ie retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.



B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

4. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, an explanation (instructions) and (d) has been added to B.18 Permit Amendment or Revision.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

5. For clarity, additional rule cites have been added to B.21 Inspection and Entry.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**Section C**

6. The following change has been made to C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, ~~the allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

7. C.7 Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

**(f) Demolition and renovation**

**The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).**

**(f)(g) Indiana Accredited Asbestos Inspector**

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provision of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.**

8. C.12 Risk Management Plan has been revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

~~If a regulated substance, subject to as defined in 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the source must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);~~

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

9. In order to clarify which documents need to be certified by an authorized individual, the following update has been made:

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

10. It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made:

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal**

#### **Source Background and Description**

**Source Name:** Superior Solvents and Chemicals, Inc.  
**Source Location:** 1030 All Pro Drive, Elkhart, Indiana 46514  
**County:** Elkhart  
**SIC Code:** 5169  
**Operation Permit No.:** F039-16483-00487  
**Permit Reviewer:** Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Superior Solvents and Chemicals, Inc relating to the operation of a chemical solvents distribution terminal. Superior Solvents and Chemicals, Inc was issued FESOP 039-9414-00487 on June 12, 1998.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) a truck loading and unloading operation capable of transferring 100 gallons per minute of solvents;
- (b) six (6) vertical fixed roof solvent storage tanks designated T1 through T6, all installed in 1988, with maximum capacities of 10,000 gallons, each;
- (c) one vertical fixed roof solvent blend tank designated B-1, installed in 1988, with a maximum capacity of 1,000 gallons;
- (d) a 55-gallon drum filling operation capable of filling drums at a rate of 60 gallons per minute with solvents from the tanks specified in (b) and (c) above, or with solvents or resins directly from truck transport;
- (e) a tote tank filling operation capable of filling totes at a rate of 60 gallons per minute with resins directly from truck transport; and
- (f) a tote tank cleaning operation using caustic cleaning agents.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) space heaters totaling 2.6 million (MM) Btu/hr.
- (b) one (1) electric tank truck fan blower with a maximum air flow rate of 1,068 cubic feet per minute. This fan will be used to blow residual vapor out of tank trucks during solvent dispensing into storage tanks.

### **Existing Approvals**

- (a) FESOP 039-9414-00487, issued on June 12, 1998; and
- (b) First Administrative Amendment 039-14339, issued on June 18, 2001.

All conditions from previous approvals were incorporated into this FESOP.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on August 21, 2002.

There was no notice of completeness letter mailed to the source.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations pages 1 through 6.

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
MEK	greater than 10
Toluene	greater than 10
Styrene	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Potential to Emit After Issuance

The source, issued a FESOP on June 12, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP F039-9414-00487; issued on June 12, 1998.



	Potential to Emit After Issuance (tons/year)							
Process/emission unit	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
storage tanks	-	-	-	< 25.0	-	-	**	**
truck to container filling	-	-	-	< 25.0	-	-	**	**
heaters	0.1	0.1	neg.	0.1	1.0	1.1	neg.	neg.
Total PTE After Issuance	0.1	0.1	neg.	< 50.1	1.0	1.1	< 10	< 25

\*\* Hap emissions from the container filling operation are limited as equivalents to the storage tank emissions such that the whole source is less than 10 tons per year for single HAP and less than 25 tons per year for combined HAPs.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone.

### Federal Rule Applicability

- (a) Provisions of the New Source Performance Standard 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels" apply to storage tanks with storage capacity greater than 40 cubic meters (m<sup>3</sup>) (10,567 gallons) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984." Storage tanks (ID Nos. T1 through T6, and B-1), all installed in 1988, have individual capacities of less than 40 m<sup>3</sup>, and are therefore not subject to this rule.
- (b) The source is not subject to the Bulk Gasoline Terminals New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX), because this source is not a bulk gasoline storage terminal. This source does not receive gasoline by pipeline, ship, or barge.

- (c) Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.420, Subpart R) "Standards for Gasoline Distribution Facilities" apply to storage tanks and loading racks at a bulk gasoline terminal. This source does not transfer gasoline and, therefore, does not meet the definition of a bulk gasoline terminal. Therefore, this rule does not apply.

#### **State Rule Applicability - Entire Source**

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP 039-9414-00487, issued on June 12, 1998.

#### **326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)**

This source, constructed in 1988, after the applicability date of August 7, 1980, is not considered a major source because it is not one of the 28 listed source categories and the uncontrolled potential to emit of PM, PM-10, VOC, SO<sub>2</sub>, NO<sub>x</sub> and CO are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) do not apply.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart county and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the facilities at this source were constructed in 1988, therefore, 326 IAC 2-4.1 does not apply.

#### **326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source wide potential to emit of a single HAP and the combination of all HAPs shall be limited to less than 10 and 25 tons per 12 consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 do not apply. In order to comply with these limits the following conditions apply:

- (a) The total tank throughput of solvents loaded to the liquid storage tanks (T1 through T6 and B-1) shall not exceed 31,632,219.6 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This loading limit is required to limit the potential to emit total HAPs to less than 25 tons per year.
- (b) The total tank throughput of each individual HAP loaded to the liquid storage tanks (T1 through T6 and B-1) shall not exceed 9,080,732.3 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP to less than 10 tons per year.
- (c) For purposes of determining compliance, every gallon of single HAP and combined HAPs containing solvent loaded directly from a truck transport to a container shall be equivalent to 0.686 and 0.895 gallon of single HAP and combined HAPs, respectively, containing solvent loaded to the storage tanks.

Compliance with above conditions will limit single HAP, and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP 039-9414-00487, issued on June 12, 1998.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

The solvent loading of the liquid storage tanks (Tanks T1 - T6 and B-1) has unlimited potential to emit VOC of greater than 25 tons per year. The source shall limit VOC emissions from the storage tanks and storage tank to drum filling operation to less than 25 tons per year by limiting total solvent throughput of these tanks to 31,632,219.6 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

The truck transport to container filling operation has potential VOC emissions less than 25 tons per year, therefore, 326 IAC 8-1-6 does not apply.

**326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)**

This source is not subject to the requirements of this rule because the source does not store any petroleum liquid.

**326 IAC 8-4-4 (Bulk Gasoline Terminal)**

This source is not subject to the requirements of this rule because the source does not load any gasoline and is therefore, not a bulk gasoline terminal.

**326 IAC 8-4-5 (Bulk Gasoline Plants)**

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) because the source does not meet the definition of a bulk gasoline plant.

**326 IAC 8-4-6 (Petroleum Sources - Gasoline Dispensing Facilities)**

Pursuant to 326 IAC 8-4-1, the source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities) since the source does not meet the definition of a gasoline dispensing facility. Therefore, the requirements of this rule do not apply.

**326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)**

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 through 326 IAC 8-4-6 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems). Since the source is not subject to these rules, the requirements of this rule do not apply.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source began operating in 1988, therefore, this rule does not apply.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)**

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. This source is located in Elkhart County. Therefore, this rule does not apply.

**326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)**

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Stationary vessels with capacities equal to or greater than 39,000 gallons storing a VOL with a maximum true vapor pressure equal to or greater than 0.5 pounds per square inch absolute (psia), but less than 0.75 psia, are only subject to 326 IAC 8-9-6(a),(b),(g), and (h). The storage tanks, are not subject to IAC 8-9 because the source is not located in a specified county.

**Testing Requirements**

Testing of this facility is not required by this permit.

**Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance requirements for this source. The particulate emissions from this source only result from insignificant activities, with potential PM and PM-10 emissions less than 25 tons per year and 10 pounds per hour. Therefore, compliance monitoring is not required by this permit.

## **Conclusion**

The operation of this chemical solvents distribution terminal shall be subject to the conditions of the attached proposed FESOP No.: F039-16483-00487.

**Appendix A: Emission Calculations**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Address City IN Zip:** 1030 All Pro Drive, Elkhart, Indiana  
**FESOP:** F039-16483-00487  
**Reviewer:** Alic Bent/ EVP  
**Date:** January 21, 2003

**Total Potential To Emit (tons/year)**

Pollutant	Emissions Generating Activity					TOTAL
	Storage Tanks	Loading/Unloading	Drum Loading	Tote Loading	Natural Gas Combustion	
PM	0.00	0.00	0.00	0.00	neg.	0.00
PM10	0.00	0.00	0.00	0.00	0.10	0.10
SO2	0.00	0.00	0.00	0.00	neg.	0.00
NOx	0.00	0.00	0.00	0.00	1.10	1.10
VOC	3.59	34.96	20.97	0.65	0.10	60.27
CO	0.00	0.00	0.00	0.00	1.00	1.00
total HAPs	3.59	34.96	20.97	0.65	neg.	59.52
worst case single HAP	3.59 (MEK)	34.96 (MEK)	20.97 (MEK)	0.65	neg.	34.96 (MEK)

Total emissions based on rated capacities at 8,760 hours/year.

**Limited Potential To Emit (tons/year)**

Pollutant	Emissions Generating Activity					TOTAL
	Storage Tanks	Loading/Unloading	Drum Loading	Tote Loading	Natural Gas Combustion	
PM	0.00	0.00	0.00	0.00	3.56	3.56
PM10	0.00	0.00	0.00	0.00	0.93	0.93
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00
VOC	3.59	< 21.04	< 23.98	0.65	0.37	49.63
CO	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	*	*	*	0.65	negl.	< 25
worst case single HAP	*	*	*	0.65	negl.	< 10

Total emissions based on rated capacities at 8,760 hours/year.

\* Single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4. (See page 2 of Appendix A).

# **Appendix A: Emission Calculations**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Address City IN Zip:** 1030 All Pro Drive, Elkhart, Indiana  
**FESOP:** F039-16483-00487  
**Reviewer:** Alic Bent/ EVP  
**Date:** January 21, 2003

## **Limited Emissions Summary based on MEK as worst case.**

<b>Potential tank emissions:</b>	Loading/Unloading @ 144,000 gal/day throughput =	34.96 tons VOC/HAP per year
	<u>working/standing losses =</u>	<u>3.59 tons VOC/HAP per year</u>
	Total =	38.55 tons VOC/HAP per year

BACT limited tank throughput VOC ----->	< 25 tons per year	86,663.6 gal/day
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FESOP limits:	single HAP ----->	< 10 tons per year	24,878.7 gal/day
	combined HAPs ----->	< 25 tons per year	86,663.6 gal/day

<b>Potential truck to drum/tote loading emissions:</b>	Drum Loading MEK @ 84,600 gal/day =	20.97 tons VOC/HAP per year
	<u>Tote Loading Resin @ 84,600 gal/day =</u>	<u>0.65 tons VOC/HAP per year</u>
	Total =	21.62 tons VOC/HAP per year

Truck to Drum Loading limited emission equivalents:	single HAP ----->	< 10 tons/yr	36,228.3 gal/day
	combined HAPs ----->	< 25 tons/yr	96,743.3 gal/day

Tank Limit/Truck to Drum Loading Limit equivalence ratio for single HAP ----->	<u>0.686 gal tank throughput</u>
	gal truck to drum throughput

Tank Limit/Truck to Drum Loading Limit equivalence ratio for combined HAPs ----->	<u>0.895 gal tank throughput</u>
	gal truck to drum throughput

**Appendix A: Emission Calculations**  
**Tank VOC Emissions - Maximum PTE**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Address City IN Zip:** 1030 All Pro Drive, Elkhart, Indiana  
**FESOP:** F039-16483-00487  
**Reviewer:** Alic Bent / EVP  
**Date:** January 19, 2003

Tank ID	Product Stored	Losses (Tons per Year)					Total VOC Tons/yr
		Standing	Working	Withdraw	Rim Seal	Deck Fitting	
T1	MEK	0.05	0.53	--	--	--	0.58
T2	MEK	0.05	0.53	--	--	--	0.58
T3	MEK	0.05	0.53	--	--	--	0.58
T4	MEK	0.05	0.53	--	--	--	0.58
T5	MEK	0.05	0.53	--	--	--	0.58
T6	MEK	0.05	0.53	--	--	--	0.58
B-1	Xylene	0.01	0.08	--	--	--	0.09
Total VOC		0.32	3.26	0.00	0.00	0.00	<b>3.59</b>

Note: All storage tank emissions estimated using USEPA's Tanks 4.09 software program and are based on the maximum annual throughput for each solvent.



**Appendix A: Emission Calculations**  
**Emissions from Truck Loading and Unloading Operations**

**Company Name:** Superior Solvents and Chemicals, Inc.  
**Address City IN Zip:** 1030 All Pro Drive, Elkhart, Indiana  
**FESOP:** F039-16483-00487  
**Reviewer:** Alic Bent / EVP  
**Date:** January 19, 2003

**Loading Losses (based on AP-42 5th Edition, Section 5.2)**

EF =  $12.46 \times S \times P \times M / T$       where EF = loading loss (lb/kgal)  
S = saturation factor  
P = true vapor pressure (psia)  
M = molec. wt. of vapor  
T = temperature of liquid loaded (R)

Emissions (lb/hr) = EF \* thousands of gallons loaded per hour (kgal/hr)

**Uncontrolled VOC Emissions**

	L	S	M	T	P	EF	Maximum Uncontrolled
Material Loaded	Maximum Throughput kgal/hr	Saturation Factor (S)	MW lb/lb-mole	Temperature R	TVP psi	AP-42 Emission Factor (lb/kgal) $12.46 \times S \times M \times P/T$	Loading Losses (tons/yr) $L \times EF \times 4.38$
<b>Solvent Truck Unloading/Loading Losses (clean tank with submerged loading factor)</b>							
Toluene	6.0	0.50	92.14	537.00	0.44	0.4703	12.36
MEK	6.0	0.50	72.11	537.00	1.59	1.3302	34.96
<b>Solvent Drum Loading Losses (clean drums with submerged loading factor)</b>							
Toluene	3.6	0.50	92.14	537.00	0.44	0.4703	7.42
MEK	3.6	0.50	72.11	537.00	1.59	1.3302	20.97
<b>Resin Tote Loading Losses (clean with submerged loading factor)</b>							
Resin	3.6	0.50	104.15	537.00	0.08	0.0967	0.65

**Total**

**55.93**

Notes:

Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

MM BTU/HR <10

Space Heaters

Company Name: Superior Solvents and Chemicals, Inc.

Address City IN Zip: 1030 All Pro Drive, Elkhart, Indiana 46514

Permit ID: F039-16483-00487

Reviewer: Alic Bent/EVP

Date: January 21, 2003

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.6 space heaters, total combined

22.8

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	1.0

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

Page 6 of 6 TSD App A

**MM BTU/HR <100**

**Space Heaters**

**HAPs Emissions**

**Company Name: Superior Solvents and Chemicals, Inc.**

**Address City IN Zip: 1030 All Pro Drive, Elkhart, Indiana 46514**

**Permit ID: F039-16483-00487**

**Reviewer: Alic Bent/EVP**

**Date: January 21, 2003**

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.391E-05	1.367E-05	8.541E-04	2.050E-02	3.872E-05

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.694E-06	1.253E-05	1.594E-05	4.327E-06	2.391E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.